

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 98-688

September 18, 1998

PUBLIC UTILITIES COMMISSION
Inquiry into the Provision of
Competitive Meter and Billing
Services

NOTICE OF INQUIRY

WELCH, Chairman; NUGENT, Commissioner

I. SUMMARY

In this Notice, we initiate an inquiry to obtain information on issues relating to the implementation of competitive metering and billing. The inquiry focuses on identifying: 1) services that are included in competitive metering and billing; 2) choices that should be available to the consumer in implementing competitive billing and metering; 3) necessary safety and consumer protection regulations; (4) necessary proceedings in order to implement competitive billing and metering and (5) the time frame for implementing competitive billing and metering.

II. BACKGROUND

During its 1997 session, the Legislature fundamentally altered the electric utility industry in Maine by deregulating electric utility industry in Maine by deregulating electric generation services and allowing for retail competition beginning on March 1, 2000.¹ At that time, Maine's electricity consumers will be able to choose a generation provider from a competitive market. As part of the restructuring process, the Act requires utilities to divest their generation assets and prohibits their participation (except through unregulated affiliates) in the generation services market. In addition, the Act requires that the provision of electric billing and metering be subject to competition on or before March 1, 2002. 35-A M.R.S.A. § 3202(4).

The Act also requires that by March 1, 1999, the Commission provisionally adopt rules² to establish (1) minimum standards necessary to protect consumers of competitive billing and metering services and (2) codes of conduct governing the

¹An Act to Restructure the State's Electric Industry (the Act), P.L. 1997, Chapter 316, codified as 35-A M.R.S.A. § 3201-3217.

²These rules are major substantive rules as defined and governed by 35-A M.R.S.A. §§8071-8074.

relationship among transmission and distribution utilities providing electric billing and metering services, any affiliates of transmission and distribution utilities providing such services and providers of such services that are not affiliated with a transmission and distribution utility. *Id.* The Act also requires the Commission to determine each transmission and distribution utility's costs of providing electric billing and metering services that are reflected in consumer rates, including capital costs, depreciation, operating expenses and taxes. The Act further directs the Commission to separate such costs into a separate charge. *Id.* This process is commonly known as "unbundling."

On July 6, 1998, we issued a Notice of Inquiry relating to billing, metering and collection services after the advent of retail competition and before implementation of competitive billing and metering. *Inquiry into Provisions for Interactions Among Transmission and Distribution Utilities and Competitive Electricity Providers Regarding Metering, Billing and Collection, Service Commencement and Service Contract*, Docket No. 98-482, Notice of Inquiry (July 6, 1998). The comments received in this Inquiry have been very helpful in informing us on issues related to competitive billing and metering.

The following rules or proposed rules contain related provisions:³

1. Consumer Protection and Licensing (Docket No. 97-590);
2. Standard Offer Electric Service (Docket No. 97-739) and subsequent information and contracting proceedings;
3. Load Profiling and Settlement (Docket No. 97-861);
4. Interactions Among Transmission & Distribution Utilities and Competitive Electric Providers (Docket No. 98-482);
5. Chapter 81 of the Commission's existing rules;
6. Chapter 304 Standards of Conduct for Transmission and Distribution Utilities and Affiliated Competitive Electricity Providers (Docket No. 98-457); and
7. Chapter 820 Utility Requirements for Non-Core Activities and Transactions between Affiliates

The consumer protection rule will address interactions between customers and competitive electricity providers. The Interactions rule will address interactions between transmission

³There will be additional interactions that are not yet subject to investigation. In each of those proceedings and the current proceedings we will consider consistency among provisions.

and distribution utilities and competitive electricity providers in areas associated with sales to customers, including metering, billing and collections. The load profiling rule will address interactions between transmission and distribution utilities and competitive electricity providers in areas associated with ISO-NE settlement. The Standard Offer rule and its subsequent information and contracting proceedings will address interactions among only those providers who supply standard offer service, customers, and transmission and distribution utilities. The Commission's existing Chapter 81 addresses interactions between customers and transmission and distribution utilities. Proposed Chapter 304 rule governs interactions between the transmission and distribution utilities and affiliate competitive electricity providers. Some of the standards of conduct set forth in that rule may be found to be applicable if the Transmission and Distribution (T&D) utility offers competitive billing and metering services through an affiliate. Chapter 820 addresses standards for transactions between electric [and gas] utilities and their affiliates and also sets forth standards of conduct governing interactions between electric [and gas] utilities and their non-core affiliates.

While this summary is somewhat simplified, it is instructive in determining where a particular provision might reside and where overlaps might occur. We note that, for convenience, some of the rules described above may be incorporated into single chapters of the Commission's regulations.

III. ISSUES FOR COMMENT - COMPETITIVE METERING, BILLING AND COLLECTION

In this Notice we invite comment on the definition of competitive metering and billing, options that should be available to consumers, necessary consumer and safety protections, necessary proceedings, and the date for implementing competitive billing and metering. In addition, we invite comments on any additional issues the Commission should address with regard to these subjects.

A. Defining Competitive Meter Services

Question 1:

a. What services should be included in the term "competitive meter services?"

b. The Act defines electric billing and metering services as: billing and collection; provision of a meter; meter maintenance and testing; and meter reading. 35-A M.R.S.A. §

3201(8). For competitive metering services, what specific services should be included in the provision of a meter, meter maintenance and testing, and meter reading?

c. The California Commission has included the following unbundled functions as meter services:

1. meters
2. meter installation
3. meter operation and maintenance services
4. meter testing and certification
5. meter reading, and meter data management

Opinion Regarding the Meter and Data Communications Standards Workshop Report, D.77-12-048 (California PUC, Dec. 3, 1997) (available on the Internet at http://www.cpuc.ca.gov/electric_restructuring/decisions.shtml). In addition, it has identified the following as meter data management services. These services would be provided by either the T&D utility or the competitive provider.

1. manage meter reading schedule
2. read and retrieve meter data
3. validate, edit and estimate meter data
4. calculate usage
5. format data
6. store data on meter data management server
7. manage data on the meter data management server
8. manage data access to the meter data management server
9. meter/device management (i.e., when the meter/device was installed, what type of device, service history of device, service parameters of the device, etc.)

Id. A working group in Arizona compiled the following list of meter services it identified as competitive:

1. Installation of meters
2. Installation of instrument transformers, test switches, and wiring
3. Maintenance and trouble shooting of all the above
4. All other equipment necessary to meet the requirements of specific customer's applications, when used primarily as billing/energy accounting tools
5. Coordinate replacement and return of existing metering equipment

6. The timely communication of all required metered data to all "authorized" parties
7. Making customer data available to customers upon request
8. Liability for "mis-metered" customers
9. Automated Meter Reading systems including communication system
10. Programming of solid-state registers
11. The validation, editing and estimation process to convert "raw data" to billing and settlement ready quality
12. The provision of data storage and other data management services
13. Maintaining security of metered data access
14. Meter testing
15. Provision of diagnostic services
16. Physical disconnects and reconnects in the field
17. Load research meters

Unbundled Services and Standards Working Group Report to the Commission (Arizona Working Group Report)(November 3, 1997) (Available on the Internet at <http://www.cc.state.az.us/working/unbundle.htm>). Please comment on these lists of services. What services, if any, are not included in these lists but should be? What listed services should remain bundled with T&D service? For example, should physical disconnects and reconnects in the field remain bundled with the T&D utility?

B. Possible Scenarios for Competitive Metering

The Commission has identified four possible scenarios for the provision of competitive meter services:

Scenario 1

The consumer can buy competitive metering services from third party meter providers as well as from any competitive electricity provider which offers such service or the T&D utility.

Scenario 2

The consumer can buy metering services from the T&D utility or any competitive electricity supplier which offers such service. Third party meter providers can subcontract with T&D or competitive generation suppliers. This is the option chosen by California and recommended by the New York working group on meter ownership and control.

Scenario 3

Only the competitive electricity supplier may provide metering services. A T&D metering affiliate could supply metering services to the competitive electricity provider.

Scenario 4

Only the T&D utility may provide metering services, but it is required to bid out for the provision of such services.

Question 2:

a. What are the advantages and disadvantages of each scenario? Do any of the scenarios adversely affect retail competition in Maine?

b. Under scenario 1 or 2, should the T&D utility be required to provide metering services to an end user only through an affiliate? If so, why? Should the requirement to form an affiliate only apply if the T&D utility will provide metering services to competitive electricity providers or other T&D utilities?

c. Under scenario 1, does the Commission have the authority to impose safety standards as a condition of licensing third party meter service providers? Does the Commission have any authority to enforce safety standards against a third party meter provider other than revoking its license? Would the Commission have the authority to impose fines on third party meter providers? Does the consumer want to buy meter services from a third party? Are there any benefits to consumers in allowing direct choice of third party metering service? How would data for ISO settlement be recorded and processed? Does scenario 1 provide an unnecessary level of complication into competitive metering?

d. The California Commission has chosen scenario 2 for the provision of competitive meter services. Its rationale for this choice is as follows:

Our reasons for limiting end-use customers to select their metering services from only ESP's or the UDCs are several. First, this limitation allows us to maintain some level of control over potentially dangerous meter installations. It also provides a mechanism

to ensure that the providers of electrical services remain accountable. And third, it promotes efficient administration by minimizing mechanisms to track all of the different service options and providers. By having the UDC or the ESP remain responsible for meter installations, we can ensure that certain meter installation standards are adhered to, institute proceedings to revoke the registration of the ESP and take other corrective measures as provided for in Public Utilities Code Section 394.25. The UDC, as an entity regulated by this Commission, would face similar actions.

If a customer was free to choose from the various participants offering a variety of metering services, it would be much more difficult for the Commission to exercise control over these kinds of participants. An example of this is the MSP [meter service provider]. If the end-use customer was able to select its own MSP to install a meter for direct access, the meter installer would not encounter any tariff restrictions or controls over its action. Safety concerns over meter installation, as well as concerns over the reliability and accuracy of the meters, require that the Commission retain some regulatory oversight in this area. We have created that oversight by making the UDC or the ESP responsible for the metering functions.

We see merit in eventually allowing customers to choose their own individual metering services from different providers. However due to safety, reliability, and accuracy concerns, such choices are not feasible at this time. If systems can be developed to address these concerns, we would be willing to revisit the further unbundling of metering services in the future.

Opinion at 2. Please comment on the rationale supplied by the California Commission in determining that only T&D companies and competitive electricity providers may provide meter services to an end user.

e. Is scenario 4 consistent with the statute's requirement that the provision of metering services be subject to competition? Should the T&D utility be allowed to bid on the provision of its own metering service, and if so, should it be required to form an affiliate separate from the T&D utility?

f. Under scenarios 1 and 2, should the T&D utility be required to bid out for the metering services it provides? Is there any reason for a bidding process if the consumer can choose a competitive electricity provider to perform metering functions? If a bidding process were required, should the T&D or the winning bidder be responsible for consumer protection? If the T&D utility is made responsible for consumer protection, will the terms of the contract between the T&D utility and the winning bidder provide sufficient assurance to the T&D utility that the winning bidder will comply with consumer protection and safety rules? If the winning bidder is responsible for consumer protection, what would be the source of the Commission's authority over the winning bidder?

g. Under each scenario what measures are necessary to achieve and maintain data integrity? Please discuss the relative costs of various measures that may be necessary to achieve and maintain data integrity.

C. Consumer Protection and Safety

Question 3:

a. Should there be a provision allowing the Commission to revoke the license of the competitive electricity provider for noncompliance with meter standards established in the rule? If not, what other method would ensure provider compliance with meter standards?

b. If meter service were provided to customers by third parties (scenario 1 above), would the Commission have authority to impose safety regulations on these third party providers of meter service? What is the source of this authority? Would such authority extend to the Commission's ability to impose fines for violating safety standards?

c. Meter installations must meet National Electric Code and utility standard requirements. How could these requirements be met if meter services were provided by an entity other than the competitive electricity provider or the T&D utility? Who would be responsible for compliance with these requirements?

d. Are there any states that allow third parties to provide meter services directly to a customer?

e. Should there be a third party entity to oversee and audit to ensure meter standards and data integrity?

D. Meter Provider Standards

Question 4:

a. Should the provisions relating to meter standards in Chapter 32 of the Commission's rules be applicable to all meter service providers? What additional service standards are necessary in order to implement competitive billing and metering? Should these service standards be determined as part of this rule or in a separate proceeding required by this rule? Is it reasonable to direct a statewide working group to create recommended standards for Commission approval?

b. Most states considering competitive metering are considering or implementing a meter certification process. Two examples are California and New York. Should there be a certification process for nonutility meter service providers? What requirements or standards should a nonutility meter service provider have to meet in order to be certified? Should there be a bonding requirement? Should the establishment of a certification process be determined in a separate proceeding from this rulemaking?

c. Please comment on the meter certification process required in California. Available on the Internet at http://www.cpuc.ca.gov/electric_restructuring/decisions.shtml) or from the Maine Commission by request. Should a similar process be adopted in Maine?

E. Meter Ownership and Control

Question 5:

a. Should the customer be allowed to own his own meter?

b. Who should have access to the meter?

c. What safeguards are necessary to ensure safe and accurate meter operation if several entities have access to the meters? Should the owning entity retain responsibility for accuracy and safety?

d. The Working Group in New York has made a number of recommendations about meter ownership and control. These recommendations are available on the Internet at http://www.dps.state.n.y.us/esco_metering.html or from the Maine Commission on request. Please comment on these recommendations.

F. Necessary Proceedings

Question 5:

a. Assuming the rule establishes proceedings to unbundle meter costs and determine what type of meter costs are stranded by competitive metering, and to certify meter providers, what additional proceedings are necessary to implement competitive metering? Should working groups be established to make recommendations on matters such as meter standards and information flow? What other issues relating to competitive metering should working groups address? What sectors should be represented in each of the working groups?

b. Should the date for competition in the provision of metering services be before March 1, 2002? What factors weigh in favor of beginning competition earlier? What factors weigh against beginning competition in the provision of metering services prior to March 1, 2002?

c. Should competitive metering be phased in between March 1, 2000 and March 1, 2002? If so, how might this be accomplished?

d. What standards of conduct from Chapter 820 and proposed Chapter 304 should be applicable to standards of conduct governing the relationship among transmission and distribution utilities providing meter services, any affiliates of transmission and distribution utilities providing such services and providers of such services that are not affiliated with a transmission and distribution utility? Are there additional standards that should be applicable?

G. Defining Competitive Billing and Collection Services

Question 6:

a. What services should be included in competitive billing services? For example, should competitive billing services include calculation of the bill or simply issuance of the bill? In California, a competitive provider may offer "full consolidated billing" which means that it calculates the T&D bill for the T&D utility or partial consolidated billing in which the

T&D utility calculates the T&D bill and provides the calculated amount to the provider. Opinion, D.98-07-032 (July 2, 1998). What are the advantages and disadvantages of allowing both "full consolidated billing" and "partial consolidated billing?" At a minimum, please discuss the implications for the T&D's financial risk, for continuity of customer data as the customer switches provider, and for ISO settlement. Should the T&D utility be allowed to retain control over calculation of its bill?

b. What does competitive collections service mean? How would "competitive collections" differ from the current option to subcontract the collections function? Should either T&D utilities or competitive providers be required to unbundle collections from their corporate functions?

H. Possible Scenarios for Competitive Billing

The Commission has identified four potential scenarios for the provision of competitive billing services:

Scenario 1

The consumer can buy competitive billing services from third party billing providers, from any competitive electricity provider which offers such service, or the T&D utility.

Scenario 2

The consumer can buy billing services from the T&D utility or any competitive electricity provider. The consumer could have either one consolidated bill or two separate bills. Third party billing providers can subcontract with the T&D or competitive electricity providers.

Scenario 3

Only the competitive electricity provider may provide billing services. A T&D billing affiliate could supply billing services to the competitive electricity provider.

Scenario 4

Only the T&D utility may provide consolidated billing services, but it is required to bid out for the provision of such services.

Question 7:

a. What are the advantages and disadvantages of each scenario? Do any of the scenarios adversely affect retail competition in Maine?

b. Under scenario 1 or 2, should the T&D utility be required to provide billing services to an end user only through an affiliate? If so why? Should the requirement to form an affiliate only apply if the T&D will provide wholesale billing services?

c. Under scenario 1, does the Commission have the authority to impose consumer protection standards as a condition of licensing third party billing service providers? Does the Commission have any authority to enforce consumer protection standards against a third party billing provider other than revoking its license? Would the Commission have the authority to impose fines on third party billing providers? Does the consumer want to buy billing services from a third party? Are there any benefits to consumers to allowing direct choice of third party billing services? Are there risks to the T&D or to the provider in allowing the consumer direct choice of third party billing services? Should third party billers be required to follow electronic transfer rules established for T&Ds and providers? Does scenario 1 provide an unnecessary level of complication into competitive billing?

d. Financial assistance programs such as Section 8 housing, HEAP and the electricity lifeline program are designed to include electric usage and/or cost information to help determine the need of participants and to calculate participants' benefits. Under scenario 1, how could this information be made available for these programs if billing and/or metering were done by an entity other than the competitive electricity provider or the T&D utility? Who would be responsible for the accuracy of the information?

e. Under scenario 2, we assume that if the competitive electricity provider provides its own or consolidated billing services, that it is subject to the provisions of Chapter 305 governing licensing and consumer protection provisions for competitive electric providers. Similarly a T&D utility that provides its own or consolidated billing is subject to chapters 81 and 86 of the Commission's rules. Please comment on these assumptions.

f. Under scenarios 1 and 2, should billing for T&D services be put out to bid? Is there any reason for a bidding process if the consumer can choose a competitive electricity provider to perform the T&D billing function? If a bidding process were required, should the T&D or the winning bidder have responsibility for consumer protection? If the T&D utility is made responsible for consumer protection, will the terms of the contract between the T&D utility and the winning bidder provide sufficient assurance to the T&D utility that the winning bidder will comply with consumer protection and safety rules? If the winning bidder is responsible for consumer protection, what would be the source of the Commission's authority over the winning bidder?

g. If the competitive electricity provider supplies a consolidated bill, should the provider be responsible for payment to the T&D utility of amounts billed for T&D service even if customers fail to pay the billed amounts? This is the conclusion reached by the California Commission. If not, why?

h. Does the bonding requirement set forth in our proposed Chapter 305 address any concerns about having a provider that is a poor credit risk be responsible for the T&D revenue stream? If not, what credit standards should be imposed? Should there be a separate certification requirement for providers of billing services? Rather than imposing a specific bonding requirement, the California Commission has stated that T&D utilities may impose reasonable credit requirements on providers to ensure that the providers are a creditworthy entity. The credit requirements are required to be filed with the California Commission. Should this requirement be in addition to the licensing standards for competitive generation providers set forth in the proposed licensing and consumer protection rule? If so why? If not, why not?

i. Is scenario 4 consistent with the statute's requirement that the provision of billing services be subject to competition? Should the T&D utility be allowed to bid to provide its billing service and if so should it be required to form an affiliate to bid on the provision of such service?

I. Consumer Protection*Question 8:*

a. Section 4(H) of proposed Chapter 305 sets forth requirements for information to be included on smaller (<100 kW) customers' billing statements. This includes a requirement that the billing statement contain "[a]n itemized list of other charges or fees for each service or product billed by the provider to the customer for the current billing period." Proposed Chapter 305(4)(H)(1)(e). The proposed rule also requires that the provider's bill specify the billing charges for generation. Thus, the rule as proposed might be read as requiring a competitive provider that provides consolidated billing to clearly identify on its billing statement all components of service including energy, transmission and distribution, billing and metering services. Once competitive billing occurs, should this provision be changed to allow a competitive provider offering billing services to "package" its product? Will it be too difficult for the consumer to shop for the best deal if he cannot compare the different components offered on the bill? How will the consumer know whether he is being charged correctly if components for each type of charge are not clearly itemized? Does this section include other requirements for information on the provider bill that should be modified once competitive billing is implemented? If so, please identify these requirements and explain why they should not be applicable once competitive billing is implemented. If a T&D utility offers consolidated billing to an end user, should the bill disclosure requirements be applicable to it as well? If not, why not?

b. A working group in Arizona determined that the following minimum information is required to appear on a non-standard offer customer's bill unless a customer makes a written request to receive less information on a bill. Please comment on this list. Is there additional information that should be listed? Is too much information included in this list?

1. Customer name and address
2. Date and meter reading at the start of the billing period or number of days in the billing period
3. Date and meter reading at the end of the billing period
4. Bill usage and demand
5. Rate Schedule number
6. LDC and billing agent (if the Electric Service Provider (ESP)) telephone number
7. Service Account number

8. Amount due and due date
9. Past due amount
10. Adjustment factor where applicable
11. Applicable taxes
12. Commission telephone number and address
13. Basic service charge
14. Distribution charge
15. Transmission and ancillary services charges
16. Generation charge
17. System benefits charge
18. CTC charge
19. Metering and billing charges
20. Other products and services if applicable

Arizona Working Group Report.

c. If billing services were provided to customers by third parties, would the Commission have authority over these third parties? What is the source of this authority? If such third parties agreed to maintain certain consumer protection standards as a condition of providing billing services to customers, would the Commission have the authority to resolve complaints regarding the practices of such entities? Does a third party billing agent have the same interest in billing accuracy and customer service as a T&D utility and competitive electricity provider? Would dispute resolution procedures be too complicated if customers could choose a third party billing agent? For example, if a customer believed that his bill was inaccurate, would a customer have to bring a complaint against the billing agent, the meter provider, the competitive generation provider and the T&D utility?

d. Proposed Chapter 304 would require the T&D utility to obtain the customer's written authorization prior to the release of customer specific information which would include billing information. Chapter 820 contains a similar provision. Should any competitive provider be required to have the customer's written authorization to obtain customer billing information for billing purposes or should a competitive provider be able to obtain such information for billing purposes if it has obtained authorization through third party verification or through a customer initiated call to an independent third party (Massachusetts model)? What additional safeguards are necessary if written authorization is not required?

J. Standards of Conduct*Question 9:*

a. What standards of conduct from Chapter 820 and Chapter 304 should govern the relationship among transmission and distribution utilities providing electric billing services, any affiliates of transmission and distribution utilities providing such services and providers of such services that are not affiliated with a transmission and distribution utility? Are there additional standards that should apply?

K. Necessary Proceedings*Question 10:*

a. Should the date for competition in the provision of billing services be before March 1, 2002? What factors weigh in favor of beginning competition earlier? What factors weigh against beginning competition in the provision of billing and metering services prior to March 1, 2002.

b. Should competitive billing be phased in between March 1, 2000 and March 1, 2002? If so, how might this be accomplished?

L. Questions Relating to Both Billing and Metering Services*Question 11:*

a. What consumer protection requirements, if any, from proposed Chapter 305 governing practices of competitive generation providers should apply to all meter and billing service providers? What other standards should the Commission adopt to protect consumers of competitive billing and meter services? Should the rule state that any competitive electricity provider which provides competitive metering and billing services is subject to the provisions of Chapter 305?

b. Should a standard offer customer be required to take billing and metering services from the T&D? If so should the T&D be required to put billing and metering services out to bid for standard offer service? Should instead a standard offer customer be required to take billing and metering services from a standard offer provider? If so, how would this work assuming that there will be more than one standard offer provider for each customer? If customers are required to take billing and metering services from the standard offer provider, how could the

Commission ensure that customers are not paying unreasonable charges for such services? Should there be a separate bidding process for standard offer providers of billing and metering services? Would this add an unnecessary layer of complication and expense to standard offer service?

c. Should a standard offer customer be able to select metering and billing services from the T&D utility or another competitive electricity supplier? What entity is the default provider of metering and billing services if the standard offer customer fails to choose a provider of metering and billing services? If a customer has failed to choose a competitive electricity provider, is it reasonable to expect that the customer would want to choose a billing and metering services provider? If a customer cannot obtain service from a competitive electricity provider, would the customer likely be able to obtain billing and metering services from a competitive electricity provider?

d. Should the determination of the transmission and distribution utility's costs of providing electric billing and metering services that are reflected in consumer rates be determined in a separate adjudicatory proceeding for each transmission and distribution utility? Should this separate proceeding include a determination of the amount of a utility's stranded costs for billing? and metering? Are there stranded costs for both billing and metering? If so please identify what type of costs would be stranded. Under scenario 1 and 2, should the T&D utility be required to unbundle billing, metering and collection and print the cost of providing the services on its bill?

e. Should Commission rules provide for a dispute resolution process governing disputes between the competitive electricity provider and the T&D utility over metering and billing matters? Instead, should these disputes be governed by the contract between the T&D utility and the competitive electricity provider? What are the advantages and disadvantages of each alternative?

f. Besides the proceedings noted above (unbundling, stranded cost determination, certification process for meter providers) what additional proceedings or determinations will be necessary to make the transition to competitive metering and billing?

IV. INQUIRY PROCESS

Interested Persons may participate in this inquiry by filling a letter stating their interest in this proceeding no later than September 28, 1998. The letter should be addressed to Dennis L. Keschl, Administrative Director and include the docket number, Docket No. 98-688. The Commission will then issue a service list. All subsequent filings must be served to all interested persons on the service list. Interested persons may file substantive comments by October 16, 1998.

Accordingly, we

O R D E R

1. That an Inquiry shall be opened as described in the body of this Notice;
2. That this Notice shall be sent to all electric utilities in the State of Maine;
3. That this Notice shall be sent to the service list of electric restructuring, Docket No. 95-462;
4. That this Notice shall be sent to parties who have shown an interest in comparable cases in Massachusetts;
5. That this Notice shall be sent to the service lists of Docket No. 97-861, Docket No. 97-739, and Docket No. 97-590; and Docket No. 98-482.
6. That this Notice of Inquiry will also be posted on the Commission's website, <http://www.state.me.us/mpuc>.

Dated at Augusta, Maine this 18th day of September, 1998.

BY ORDER OF THE COMMISSION

Dennis L. Keschl
Administrative Director

COMMISSIONERS VOTING FOR: Welch
 Nugent